

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

Domingo Figueroa Camacho CASE NO. 08-05425(GAC)

Judith Alicea Ayala CHAPTER 13

Debtors

**ATTORNEY'S REQUEST FOR ALLOWANCE  
OF COMPENSATION**

**TO THE HONORABLE COURT:**

**COMES NOW** Hector Velazquez Hernandez, attorney for debtor, and very respectfully states:

1. That the undersigned attorney as per Administrative Order Num. 06-01-ESL, moves the court for the allowance of attorney's fees as per the following statement informing the Court of attorney's fees and costs in the above captioned case.

2. Services covered under the "flat" rate of \$3,000.00 include the following:

**8/01/2008** Interview with clients regarding their new financial conditions and alternatives available under the New Bankruptcy Law. Preparation of a list of documents that are needed in order to file the bankruptcy petition under the new law. Explanation as to the new bankruptcy law, the difference between the old one, the new duties of a Debtor under the new law, the requirements under section 527 (b), explanation and signature of such notice required under the law. Explanation of the new requirements under the new law. Review and photocopy of the documents already provided by debtor including the foreclosure of his community property.

**3 .00**

**8/09/2008** Meeting with debtors to review the additional documents submitted by debtors as per our request and photocopy of the same. Preparation of draft of petition, the schedules and form b22c- Statement of Current Monthly Income and Calculation of

Commitment Period and Disposable Income.

2.00

8/22/2009 Filing of bankruptcy petition.

1.00

8/23/2009 Preparation and filling Motion for Extension of Automatic Stay with certificate of service.

1.00

8/26/2009 Preparation and filling of schedules I and J

1.00

8/27/2009 Preparation and filling of Chapter 13 plan

.50

8/27/2009 Preparation and sending of stay order to state marshall in order to stay the foreclosure proceedings at the state court.

.50

8/27/2008 Review and log in of Notice sent by the Court relating the different dates and times for the 341 meeting and confirmation hearing, and preparation and sending of reminder letter to debtor in Spanish language as to those dates and the documents needed for those hearings.

1.00

8/27/2008 Review and log in of Notice sent by the Court relating to the Motion for Extension of Stay.

.50

9/3/2008 Telephone call to debtor to discuss remaining documents and set up follow-up meeting.

0.25

9/8/2009 Preparation and Filling of Motion requesting the continuance of the Automatic Stay and to vacate hearing.

0.75

**9/8/2009** Preparation and Filling of Motion to Object creditor Muebleria Berrios Proof of Claim.

**0.75**

**9/9/2009** Review and log in of Notice of Appearance sent by creditor RG Mortgage.

**.25**

**9/9/2009** Review and log in of Minutes of proceedings sent by the Court relating to the Motion for Extension of Stay.

**.50**

**9/9/2008** preparation and sending of second reminder letter to debtor in Spanish language as to the documents needed for the 341 hearing.

**0.25**

**9/10/2008** Call to debtors regarding documents to be provided for the 341 meeting.

**.25**

**9/11/2008** Call to debtors regarding documents to be provided for the 341 meeting.

**.25**

**9/20/2008** Call to debtors regarding documents to be provided for the 341 meeting. (2 calls)

**.50**

**9/23/2008** Call to trustee offices regarding documents for 341 meeting

**.25**

**9/23/2008** Preparation of documents and payments advices sent to trustee's office.

**.50**

**9/25/2008** Appearance at the 341 meeting.

**2.00**

**9/25/2008** Review and log in of Notice of 341 meeting. Trustee's negative recommendation.

**0.50**

**10/7/2008** Review and log of Motion to dismiss filed by trustee regarding documents and amendments needed. Call to debtors to discuss motion.

**1.00**

**10/9/2008** Amend and fill amended schedule B, C, I and J and amended Chapter 13 plan.

**2.00**

**10/10/2008** Review and log in Order to Trustee regarding motion to dismiss.

**0.25**

**10/16/2008** Review and log in Motion in compliance with court order filled by trustee.

**0.50**

**10/16/2008** Review and log in Trustee's negative recommendation. Call to debtors to discuss situation and urgency to comply with trustee's request.

**0.50**

**10/16/2009** Preparation and Filling of Motion requesting entry of order granting objection to creditor Muebleria Berrios Proof of Claim.

**0.50**

**1/22/2009** Review and log in Motion to Lift Stay filled by creditor RG Mortgage. Telephone call to debtor Judith Alicea to discuss motion filed and to know whereabouts of joint debtor Domingo Figueroa who has not returned any phone calls or messages left.

**1.00**

Total Hours	23.25
Rate per hour	\$ <u>150.00</u>
Total dollar hours	\$ <u>3,487.50</u>

3.The services performed and detailed above have been actual and necessary for the preservation of the estate which have been rendered after the commencement of the present case.

4.The undersigned attorney has not shared and in any way has offered to share the monies, fees and costs referred to above with any other person.

5.The foregoing information is true and correct to the best of my knowledge, information and belief and the same is in accordance with the records held in my office.

**WHEREFORE,** it is respectfully requested from this Honorable Court to allow the payment of the attorney's fees as detailed herein.

**NOTICE TO ALL PARTIES IN INTEREST**

"Parties in interest are hereby granted twenty (20) days from the date of notice to oppose the motion and request a hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon the filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed the Court will schedule the motion for a hearing as contested matter."

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties in interest and by regular mail to non CM/ECF participants.

In San Juan, Puerto Rico, this 23th day of March, 2009.

**/s/HECTOR VELAZQUEZ HERNANDEZ**

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